

Remarks

Claims 1-30 are pending in this application. Claims 25-28 are allowed. Claims 1, 2, 6, 12-18, 29, and 30 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,766,412 to Bolt (hereinafter “Bolt”) in view of U.S. Patent No. 6,631,481 to Hoard et al. (hereinafter “Hoard”). Claims 3-5, 7-11 and 19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Bolt in view of Hoard, further in view of U.S. Publication No. 2003/0084219 to Yao et al. (hereinafter “Yao”). Claims 20-24 are objected to as being dependent upon a rejected base claim.

A. Obviousness Rejection of Claims 1, 2, 6, 12-18, 29, and 30 Over Bolt in View of Hoard

The examiner has rejected Claims 1, 2, 6, 12-18, 29, and 30 under 35 U.S.C. § 103(a) as being obvious over Bolt in view of Hoard. Applicants submit that the combination of Bolt and Hoard does not render these claims obvious. In order to establish a *prima facie* case of obviousness, the references cited by the Examiner must disclose all claimed limitations. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974). Specifically, Bolt, in view of Hoard, fails to teach or suggest all the limitations of Claims 1, 2, 6, 12-18, 29 and 30. Contrary to Examiner’s statement Bolt does disclose “determining an address of the one of the plurality of hosts that issued the original command” as required by Claim 1. (Office Action at page 3) Whereas, the portion of Bolt cited by Examiner relates to setting user configurations for data transfer device interface or tape drive. (Bolt at 9:38-42) Setting user configurations for the interface is not the same as determining the address of the host that issued the original command.

Also, Examiner states that “Bolt does not expressly disclose adding an identifier to the original command encoded in the second protocol to make a revise command.” (Office Action at page 3) Despite Examiner’s statement to the contrary, Bolt cannot disclose “sending

the revised command to a target device” as Bolt does not disclose the step of making a revised command as per Examiner’s own statement. (Office Action at page 3) Examiner cites to Hoard for disclosing this step of making a revised command. (Office Action at page 3). However, there is no motivation to combine Hoard with Bolt as Hoard is directed to a “method for injecting an error into a waveform sent over a data link” for purposes of testing and not identifying host computers at a physical layer. (Hoard at 2:21-23) In general, Hoard discusses generating a control signal in response to a control event in the waveform. (Hoard at 2:23-25) An error is injected into the waveform so as to distort the waveform. (Hoard at 2:25-26) Thus, a person of ordinary skill in the art would not look to Hoard to combine with Bolt with regards to the step of making a revised command.

Further, not only is there no motivation to combine Hoard and Bolt, Hoard does not disclose the step of making a revised command as required by Claim 1 for which it has been cited. Examiner’s citation to Hoar in general discusses control events that may include a frame header. (Office Action at page 3; Hoard at 6:30-34) The frame header may include symbols such as a source identification symbol. (Hoard at 6:34-40). Hoard does not define source identification, e.g. that the source identification in the frame header is an “identifier associating one of the plurality of hosts that issued the original command,” so as to meet the requirements of Claim 1. Hoard discusses a “data frame [] sent over a data link within the system” and not adding an identifier to the original command encoded in the second protocol to make a revised command, the identifier associating the one of the plurality of hosts that issued the original command” as required by Claim 1. (Hoard at 4:22-23)

Further, with regards to dependent Claim 18, Hoard does not disclose “decoding a fibre channel frame to obtain the fibre channel port identification address.” Bolt merely discusses each microbridge decoding host commands directed to tape drives. (Bolt at 17:16-19).

As Bolt in view of Hoard does not disclose each and every element of Claim 1, dependent Claims 2, 6, and 12-18 are also not disclosed. The same analysis above with regards to independent Claim 1 applies to independent Claims 29 and 30. Applicants respectfully request withdrawal of rejections to Claims 1, 2, 6, 12-18, 29, and 30 and that these claims be passed to issuance.

B. Obviousness Rejection of Claims 3-5, 7-11, and 19 Over Bolt in View of Hoard further in view of Yao

As stated above with respect to Claim 1, Bolt does not disclose the step of making a revised command. Likewise Yao does not disclose this step as Yao discusses communication modes and not the making of a revised command. (*See* Yao at page 2, paragraph [0025]) Thus, the same analysis above with respect to Claim 1 applies to Claims 3-5, 7-11, and 19 as each of these claims depends from Claim 1. Applicants respectfully request withdrawal of rejections to Claims 3-5, 7-11, and 19 and that these claims be passed to issuance.

C. Objection to Claims 20-24

The objection to dependent Claims 20-25 will not be discussed herein, as these claims depend from otherwise allowable base claims. As such, Applicants respectfully request that the rejection of the dependent claims be withdrawn and that these claims be passed to issuance.

D. No Waiver

All of Applicants’ arguments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from the cited references. Other

distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicants do not acquiesce to the Examiner's additional statements, such as, for example, any statements relating to what would be obvious to a person of ordinary skill in the art. The example distinctions discussed by Applicants are sufficient to overcome the obviousness rejections.

Conclusion

Applicants believe that pending claims 1-30 are in condition for allowance, and request the same.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tammy M. Pennington', written over a horizontal line.

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Date: December 26, 2007

Attorney Docket Number: 016295.1506